

JEFFREY A. BRONSTER, ESQ.
ATTORNEY AT LAW
17 WENDELL PLACE
FAIRVIEW, NEW JERSEY 07022

(201) 945-2566

Facsimile: (201) 945-2688
email: jbronster@bronsterlaw.com

MEMBER OF NEW JERSEY & NEW YORK BAR

November 16, 2021

Honorable Vincent F. Papalia
United States Bankruptcy Court
50 Walnut Street
Newark, NJ 07102

Re: In re: Evaristo Burdiez
Case No. 20-23664/VFP

Dear Judge Papalia:

This is to respond to Mr. Chavez's letter of yesterday. He is correct that North Jersey's opposition/reply brief was filed out of time. This was my error. I had overlooked that a motion schedule had been entered, and I had instead been guided by the deadlines in Local Rule 9013-2(a), pursuant to which my papers would have been due on November 14, 2021, which was a Sunday. By operation of Bankruptcy Rule 9006 (a)(1)(C), the due date would then have become the following Monday, *i.e.* yesterday, the day that I filed the opposition.¹

I apologize for my error, and I ask that the Court consider the letter-brief that I filed in the interests of justice.

Thank you for your courtesy in this matter.

Respectfully submitted,

Jeffrey A. Bronster

JEFFREY A. BRONSTER

cc: All Counsel and Parties via PACER

¹ Although not excusing the late filing, North Jersey notes that the scheduling letter submitted by Mr. Chavez on October 16, 2021 is inaccurate and confusing. It states a deadline for him to file opposition and cross-motions, but the only other deadline is for filing "surreplies", a term entirely inapplicable here. No date is stated for North Jersey to file a reply brief, or its opposition to a cross-motion. A surreply is a supplemental filing after all other permitted filings have been made, and permission for such is rarely sought; certainly it has not been in this case.